

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

Case Number: 22-mc-91290-AK

JOHN DOE,
Defendant.

**ASSENTED TO MOTION FOR ENDS-OF-JUSTICE CONTINUANCE OF TIME FOR
FILING AN INDICTMENT OR INFORMATION, AND EXCLUSION OF TIME UNDER
THE SPEEDY TRIAL ACT**

The United States of America, by and through Assistant United States Attorney David G. Tobin, respectfully moves this Court to grant a continuance of the time within which an Indictment or Information must be filed as to said defendant to July 25, 2022, and exclude the time period from June 16, 2022, through July 25, 2022, from the speedy trial clock, pursuant to the Speedy Trial Act (ASTA@), 18 U.S.C. "3161(h)(7)(A), and Sections 5(b)(7)(B) and 5(c)(1)(A) of the *Plan for Prompt Disposition of Criminal Cases* for the United States District Court for the District of Massachusetts (effective December 2008), on the grounds that the ends of justice served by granting the requested continuance and excluding this period outweigh the best interests of the public and the defendant in a speedy trial. The United States further asks this Court to issue the attached proposed *Order of Continuance and Excludable Delay*. In support of this request, the government states as follows:

1. On October 20, 2020, John Doe ("Defendant") was charged by criminal complaint with False representation of a Social Security Number, in violation of 42 U.S.C. § 408, and aggravated Identity Theft, in violation of 18 U.S.C. § 1028A. (Case No. 20-mj-6617-MPK).

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Defendant was arrested on May 23, 2022, and made his initial appearance before Magistrate Judge M. Page Kelley, at which the United States did not move to detain Defendant and he was released on conditions. On June 10, 2020, the defendant waived his right to a probable cause hearing and contested detention. Pursuant to the provisions of the Speedy Trial Act, the government must secure an Indictment against Defendant or file an Information not later than on or about June 23, 2022.

2. The parties have initiated discussions about a possible resolution to the case without trial and believe the requested enlargement of time to indict or file an Information will provide sufficient time complete negotiations.

3. The defense assents to this motion.

6. A proposed order is attached.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ David G. Tobin
DAVID G. TOBIN
Assistant U.S. Attorney

Dated: June 16, 2022

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

By: /s/ David G. Tobin
DAVID G. TOBIN
Assistant U.S. Attorney

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